

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: DEALER MANAGEMENT SYSTEMS
ANTITRUST LITIGATION

This Document Relates to:

Cox Automotive, Inc., et al. v. CDK Global, LLC,
Case No. 1:18-cv-1058 (N.D. Ill.)

MDL No. 2817
Case No. 18 C 864

Hon. Robert M. Dow, Jr.
Magistrate Judge Jeffrey T. Gilbert

**COX AUTOMOTIVE, INC., ET AL.'S MOTION FOR A PROTECTIVE ORDER
TO PREVENT THE DEPOSITION OF SANDY SCHWARTZ**

Plaintiff Cox Automotive, Inc. and its affiliates (“Cox Automotive”) respectfully request a protective order pursuant to Federal Rule of Civil Procedure 26(c) to preclude the deposition of Sandy Schwartz, President of Cox Automotive. In support of this motion, Cox Automotive incorporates by reference the memorandum of law and exhibits filed concurrently herewith and any oral argument that the Court may allow at a hearing on this Motion.

Pursuant to Local Rule 37.2, Cox Automotive certifies that they have met and conferred with counsel for Defendant CDK Global, LLC in a good faith attempt to resolve the disputes presented by this Motion.

Dated: February 28, 2019

Respectfully submitted,

/s/ Derek T. Ho

Derek T. Ho

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Kelley Blue Book Co., Inc., vAuto, Inc.,
VinSolutions, Inc., and Xtime, Inc.*

CERTIFICATE OF SERVICE

I, Derek T. Ho, an attorney, hereby certify that on February 28, 2019, I caused a true and correct copy of the foregoing **COX AUTOMOTIVE, INC., ET AL.'S MOTION FOR A PROTECTIVE ORDER TO PREVENT THE DEPOSITION OF SANDY SCHWARTZ** to be filed and served electronically via the court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by email to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF system.

/s/ Derek T. Ho

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